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**ORIGINAL
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PACIFIC  TELESIS.
Group - Washington

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

December 11, 1992

Donna R. Searcy
Secretary
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Mail Stop 1170
1919 M Street, N.W., Room 222
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Dear Ms Searcy:

Re: *ET Docket No. 92-9 - Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies*

On behalf of Pacific Telesis Group, please find enclosed an original and six copies of its "Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

William F. Adler


Enclosures

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DEC 11 1992

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Redevelopment of Spectrum to)	ET Docket No. 92-9
Encourage Innovation in the)	
Use of New Telecommunications)	RM-7981
<u>Technologies</u>)	RM-8004

COMMENTS OF PACIFIC TELESIS GROUP

Pacific Telesis Group ("Pacific") submits its comments on the Commission's proposed Further Notice Of Proposed Rulemaking, released September 9, 1992 in the above-captioned docket.¹ The Commission proposes rules to govern the frequencies for 2 GHz licenses which will be reallocated to five bands above 3 GHz to provide spectrum for emerging technologies. Specifically, these rules follow from the Petitions For

¹Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies, ET Docket No. 92-9, RM-7981, RM-8004; Notice of Proposed Rulemaking, 7 FCC Rcd 1542 (1992); Further Notice of Proposed Rulemaking, 7 FCC Rcd 6100 (1992) ("FNPRM"); First Report and Order and Third Notice of Proposed Rulemaking, FCC 92-437, released October 16, 1992.

Rulemaking by UTC² and Alcatel.³ Pacific expressed agreement with the Alcatel Petition but raised serious reservations about several aspects of the Petition.⁴ The FNPRM appears to endorse Alcatel's Petition including those aspects objected to by Pacific in its Comments on the Petition.

Pacific strongly opposes the Commission's proposals that will 1) permit Part 94 private licensees to use frequencies previously open only to common carriers, 2) rechannel the broadband frequency pairs by overlaying narrowband channels, and 3) limit the period during which frequencies can be reserved for future growth to as short as six months.

Pacific believes the net result of these changes will be the virtual disappearance of broadband frequency slots in or near many metropolitan areas.

I. PERMITTING PRIVATE USERS INTO THE COMMON CARRIER WILL SEVERELY AFFECT SPECTRUM AVAILABLE FOR COMMON CARRIER USE

Allowing the private microwave user into the common carrier portion of the 6 and 11 GHz bands can be expected to

²Amendment of Parts 2, 21, and 94 of the Commission's Rules to Accommodate Private Microwave Systems in the 1.71-1.85 GHz Band and In Bands Above 3 GHz, Utilities Telecommunications Council, RM-7981, March 31, 1992 ("UTC").

³Amendment of Parts 2, 21, 25 and 94 of the Commission's Rules to Accommodate Common Carrier and Private Op-Fixed Microwave Systems in Bands Above 3 GHz, Alcatel Network Systems, Inc., RM-8004, May 22, 1992 ("Alcatel").

⁴Comments of Pacific Telesis Group, July 2, 1992.

severely deplete the amount of spectrum available for common carrier use. Private microwave users are heavy consumers of spectrum, not for lack of alternatives to microwave radio, but because microwave radio may be a cheap alternative. While economics is an important factor in the facility-selection process, Pacific questions the wisdom of allowing the use of microwave radio in those many locations where terrestrial facilities are immediately available. The Commission expressly encourages users to migrate to other, non-radio alternative media in order to preserve spectrum.⁵ Pacific is skeptical that private users will respond to this important suggestion. The result of authorizing private users to use common carrier frequencies will be the rapid and uneconomical depletion of the limited resources for common carriage, a result which is not in the public interest.

II. RECHANNELIZING BROADBAND FREQUENCY PAIRS BY OVERLAYING NARROWBAND CHANNELS PROMOTES BROADBAND UNDERUTILIZATION

In its responses to the Alcatel Petition, Pacific objected to subdividing 30 MHz channels into 10 MHz channels.⁶ This objection should not be disregarded. If large numbers of common carriers or private users are allowed to use narrowband frequency pairs that are superimposed or overlap portions of

⁵NPRM, p. 10, n.17.

⁶PTG Comments, p. 3.

broadband (30 MHz) frequency pairs, the entire common carrier band could be "balkanized" by these narrowband users to the point where the optimum use of the 6 and 11 GHz bands would be impossible. Instead of 30 MHz channels being loaded to or near capacity (84 DS-1s), the proposed 10 MHz sliver channels will more likely be used, each transporting but a fraction of the robust number possible.

Pacific suspects that the Commission's required minimum loading levels would not be met by many of the current licensees within both the common carrier and the private point-to-point microwave services. The splintering of the 6 and 11 GHz channels will lead to further underutilization of this valuable and diminishing resource.

The efficient administration of the proposed 10 MHz channels will be a vexing problem. For instance, in the proposed reallocation of the 6 and 11 GHz common carrier bands, nothing prevents a user from selecting the center of a 10 MHz slot which is superimposed over the middle of a 30 MHz frequency channel. This positioning not only forecloses the use of the broadband channel, but may also prevent the use of either of the other 10 MHz frequency slots in this 30 MHz slot because of adjacent channel and polarization constraints. The result will be a lightly-loaded 10 MHz channel tying up a 30 MHz frequency slot. The Commission must not establish rules that encourage (and make highly likely) the inefficient use of the 6 and 11 GHz common carrier bands.

In addition to users who legitimately need a full 10 MHz of bandwidth, there will be users tempted to bend the minimum loading requirements by overstating their current use or growth projections in order to qualify for a frequency slot. In light of limited resources, which are in ever-increasing demand, the Commission may not wish to devote those resources to monitor or police such actions.

The Commission should disregard the suggestion that there is a diminishing need for 30 MHz broadband channels. Pacific Bell's recent employment of both 6 and 11 GHz channels gives strong testimony to the contrary.

Pacific believes the only way to retain future broadband capability is to reserve at least half of the current 6 and 11 GHz common carrier bands exclusively for broadband (30 MHz) frequency pairs. This will ensure at least some broadband channelization capability and thus secure a more efficient use of the frequency spectrum.

III. A POLICY OF RESERVING FREQUENCIES FOR A PERIOD AS SHORT AS SIX MONTHS IS UNWORKABLE FOR COMMON CARRIERS

The proposal that future channels be reservable for periods as short as six months is unworkable. A six-month period simply forecloses a carrier's use of 6 and 11 GHz microwave radio as a means of providing facilities based on customer demand and rational planning. Established wireline common carriers like Pacific Bell are in the business of wireline telephone communications as a long-term method of providing service to

their customers. It would be unreasonable to expect Pacific Bell to plan and invest in a microwave radio route, given the limit of reserving frequencies for known future growth to as brief a time as six months.

IV. CONCLUSION

The effect of the foregoing proposed rule changes is likely to be that the large common carrier will be foreclosed from the efficient employment of microwave radio as a means of providing customer required facilities. Pacific, therefore, urges the Commission to modify the proposed rules to permit the reservation of some 6 GHz frequencies for common carrier use only, to reserve a significant amount of the current 6 and 11 common carrier bands exclusively for broadband frequency pairs and to establish longer periods, or express renewal authorization, to reserve future growth channels.

Respectfully submitted,

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Dated: December 11, 1992

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I, Cathy Jo Farey, hereby certify that a copy of the foregoing Comments of Pacific Telesis Group was mailed first-class United States mail, postage prepaid, this 11th day of December, 1992 to the parties listed on the attached service list.


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